

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE SQUIRRELS RESEARCH LABS LLC, *ET*
AL.

Debtors

CASE No. 21-61491-TNAP
(JOINTLY ADMINISTERED)
CHAPTER 11
SUBCHAPTER V
JUDGE PATTON

FREDERIC P. SCHWIEG, TRUSTEE

Plaintiff

V.

DAVID STANFILL

Defendant

ADVERSARY No. 23-06028

ALL DOCUMENTS REGARDING THIS
MATTER MUST BE IDENTIFIED BY **BOTH**
ADVERSARY AND BANKRUPTCY CASE
NUMBERS AND NAME OF JUDGE

JOINT STIPULATIONS

Plaintiff and Defendant hereby stipulate to the following for the purposes of this
adversary proceeding only:

1. The court has jurisdiction over this adversary proceeding pursuant to 28 U.S.C. § 1334(b) and (d) and General Order 2012-07 of the United States District Court for the Northern District of Ohio.
2. This adversary proceeding is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), (B), (C), (K) and (O).
3. On November 23, 2021 (the "Petition Date"), Squirrels Research Labs LLC ("Debtor") filed its voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code").
4. At issue in this matter are certain payments that the Trustee alleges that the Debtor made to the Defendant, as set forth in the attachment to the Complaint and attached hereto both as Exhibit A (the "Payments"). This stipulation is entered for all purposes in this matter, but one specific purpose is to allow the Court to rule on certain issues as a matter of

law. The parties anticipate that said ruling will simplify this matter for trial and may facilitate settlement of at least some claims.

5. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent, or obligations that the Defendant incurred, for, or in connection with, business-related travel on behalf of the Debtor (“Travel Expense Reimbursements”).

6. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent, or obligations that the Defendant incurred, for, or in connection with, the purchase of supplies, materials, electronic components or other goods used to directly produce the Debtor’s products (“Material Expense Reimbursements”).

7. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent, or obligations that the Defendant incurred, for, or in connection with, the purchase of materials and services for construction or remodeling of the Debtor’s premises (“Remodeling Reimbursements”).

8. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent, or obligations that the Defendant incurred, for, or in connection with, the purchase of office supplies and/or office services (“Office Expense Reimbursements”).

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9. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent in making customer refunds (“Refund Expense Reimbursements”).

Respectfully Submitted,
/s/ Frederic P. Schwieg

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Subchapter V Trustee

Respectfully Submitted,
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Counsel for Defendant

EXHIBIT A

Squirrels Research Labs LLC
Transactions: David Stanfill
All Dates

Account #	Date	Transaction Type	Num	Memo/Description	Amount	AP Paid	Comments from D Stanfill report
1010 Checking #6063	06/27/2018	Check		No Description provided - print through Accounts Payable #2001	5,000.00	Paid	Reduced customer's email amount of DPK and Mouse ordered personally
1010 Checking #6063	10/4/2018	Check		No Description provided - print through Accounts Payable #2001	1,448.97	Paid	Reduced customer's email amount of CDK and Mouse ordered personally
1010 Checking #6063	11/29/2018	Expense		QuickPay with Zelle payment to D and Stanfill 7700017862	2,500.00	Paid	Not listed in report provided by D Stanfill
1010 Checking #6063	12/6/2018	Expense		Online Transfer 7728707090 to DA and Checking #####0003 transaction is 7728670900 12/05	1,400.00	Paid	Not listed in report provided by D Stanfill
1010 Checking #6063	12/6/2018	Expense		Online Transfer 7728714748 to DA and Checking #####0003 transaction is 7728671448 12/05	3,350.00	Paid	Not listed in report provided by D Stanfill
1010 Checking #6063	12/14/2018	Expense		Online Transfer 7755272088 to DA and Checking #####0003 transaction is 7755272088 12/14	8,000.00	Paid	Not listed in report provided by D Stanfill
1020 Andrew #8796	07/16/2019	Expense		PRINTING SERVICES-Jean-Denis SOPK Card	137.82	Paid	Not listed in report provided by D Stanfill
1030 CompSource Wksh	02/22/2019	Journal Entry	233	David Stanfill Reimbursement Memo corp	6,480.00	Paid	Not listed in report provided by D Stanfill
1020 Andrew #8796	03/05/2019	Expense		David Jean Arizona	1,416.20	Paid	Not listed in report provided by D Stanfill
1020 Andrew #8796	03/05/2019	Expense		David Jean Arizona	1,416.20	Paid	Not listed in report provided by D Stanfill
1010 Checking #6063	03/13/2019	Check	632	David Reimbursement	7,292.16	Paid	Lyndee
1010 Checking #6063	03/13/2019	Check	633	David Reimbursement	8,400.00	Paid	reimbursement - customer refunds
1020 Andrew #8796	04/09/2019	Expense		HELTON HORTON'S COLLABORIS David total	289.08	Paid	Not listed in report provided by D Stanfill
1022 Duka CP-S 171	04/10/2019	Expense		DELIA AIR 005284694342 David Canada Sales Trip	809.48	Paid	Not listed in report provided by D Stanfill
1022 Duka CP-S 171	04/14/2019	Expense		HOLISTON 5132 David Canada Trip	31.71	Paid	Not listed in report provided by D Stanfill
1010 Checking #6063	04/16/2019	Expense		Online Transfer to CMK - 78831 transaction# 8137842439416 Reimburs David's Uber Charges	129.05	Paid	Not listed in report provided by D Stanfill
1010 Checking #6063	06/15/2019	Check	645	DAKS Reimbursement	43,168.83	Paid	David gave us lunch (lunch payee)
1020 Andrew #8796	06/05/2019	Expense		UNITED 016282721154-DJ Date to Chicago-Trip Insurance	38.00	Paid	Not listed in report provided by D Stanfill
1020 Andrew #8796	06/05/2019	Expense		UNITED 016282721154-DJ Date Trip Insurance-Chicago	38.00	Paid	Not listed in report provided by D Stanfill
1020 Andrew #8796	06/05/2019	Expense		UNITED 0162456343871-DJ Date flight to Chicago	631.60	Paid	Not listed in report provided by D Stanfill
1020 Andrew #8796	06/05/2019	Expense		UNITED 0162456343870-DJ Date to Chicago and Back	631.60	Paid	Not listed in report provided by D Stanfill
1030 CompSource Wksh	07/05/2019	Journal Entry	313	DPK Shipping Charges paid by David Stanfill	2,990.11	Paid	Reimbursement - International Shipping
1010 Checking #6063	07/22/2019	Check		No Description provided - print through Accounts Payable #2001	4,500.00	Paid	Reimbursement for Liquid Coding
1010 Checking #6063	08/15/2019	Check		No Description provided - print through Accounts Payable #2001	25,042.80	Paid	reimbursement for personal co
1010 Checking #6063	10/1/19	Check	641	David Traveling Loan to Cyrie for SQPK	15,893.75	Paid	US S state of Arizona Payment in hardware by DJL Right / etc. - took Pka. now cash)
1010 Checking #6063	10/1/2019	Check	500	Deduction from David AP	8,000.00	Paid	David Cash BCU funds for SQPK (Paid to Cashless to pay crypto, 2000 refund + 3000 against AP below
1010 Checking #6063	10/1/19	Check			8,000.00	Paid	Not listed in report provided by D Stanfill
1010 Checking #6063	12/4/2019	Check	643	Reimbursement to Billah Paid	19,780.00	Paid	Not listed in report provided by D Stanfill
1010 Checking #6063	12/1/2019	Check	672	Reimbursement to Billah Paid	1,000.00	Paid	Reimbursement on open balance on balance of CDK's Right + partial against Kyle 8/1/19)
1010 Checking #6063	12/17/19	Check			4,800.00	Paid	Not listed in report provided by D Stanfill
1010 Checking #6063	12/30/2019	Check		No Description provided - print through Accounts Payable #2001	7,500.00	Paid	BCU Paid to David (Duking Bill # 723 - 1155.07 balance of N/A)
1010 Checking #6063	12/31/2019	Check		No Description provided - print through Accounts Payable #2001	487.50	Paid	Reimbursement on open balance
1010 Checking #6063	01/15/2020	Check		No Description provided - print through Accounts Payable #2001	5,000.00	Paid	Reimbursement on open balance
1010 Checking #6063	01/15/2020	Check		No Description provided - print through Accounts Payable #2001	5,000.00	Paid	Reimbursement on open balance
1010 Checking #6063	01/17/2020	Check		No Description provided - print through Accounts Payable #2001	2,220.00	Paid	Paid against open AP
1010 Checking #6063	01/17/2020	Check		No Description provided - print through Accounts Payable #2001	2,780.00	Paid	Paid against open AP
1010 Checking #6063	01/21/2020	Check		No Description provided - print through Accounts Payable #2001	1,030.00	Paid	Paid against open AP
1010 Checking #6063	02/03/2020	Check		No Description provided - print through Accounts Payable #2001	550.00	Paid	Paid against open AP
1010 Checking #6063	02/03/2020	Check		No Description provided - print through Accounts Payable #2001	1,100.00	Paid	Paid against open AP
1010 Checking #6063	02/04/2020	Check		No Description provided - print through Accounts Payable #2001	5,000.00	Paid	Paid against open AP
1010 Checking #6063	02/07/2020	Check		No Description provided - print through Accounts Payable #2001	1,380.00	Paid	Paid against open AP
1010 Checking #6063	02/07/2020	Check		No Description provided - print through Accounts Payable #2001	3,180.00	Paid	Paid against open AP
1010 Checking #6063	02/11/2020	Check		No Description provided - print through Accounts Payable #2001	3,500.00	Paid	Paid against open AP (Brid flight 13)
1010 Checking #6063	02/11/2020	Check		No Description provided - print through Accounts Payable #2001	500.00	Paid	Paid against open AP (Brid flight 273)
1010 Checking #6063	02/24/2020	Check		No Description provided - print through Accounts Payable #2001	274.00	Paid	Paid against open AP
1010 Checking #6063	02/24/2020	Check		No Description provided - print through Accounts Payable #2001	4,720.00	Paid	Paid against open AP
1010 Checking #6063	02/25/2020	Check		No Description provided - print through Accounts Payable #2001	1,176.00	Paid	Paid against open AP
1010 Checking #6063	03/05/2020	Check		No Description provided - print through Accounts Payable #2001	85.35	Paid	Paid against open AP
1010 Checking #6063	03/05/2020	Check		No Description provided - print through Accounts Payable #2001	142.58	Paid	Paid against open AP (Reimburse 54.93)
1010 Checking #6063	03/05/2020	Check		No Description provided - print through Accounts Payable #2001	228.05	Paid	Paid against open AP
1010 Checking #6063	03/05/2020	Check		No Description provided - print through Accounts Payable #2001	541.40	Paid	Paid against open AP

1010 Checking #6063	02/01/2020	Bill Payment		No Description provided - yprnt through Accounts Payable #2001	700.00	Paid	Paid against open AP (Payroll #1)
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	700.71	Paid	Paid against open AP (Brid Flight #3)
1010 Checking #6063	02/01/2020	Bill Payment		No Description provided - yprnt through Accounts Payable #2001	1,225.00	Paid	Paid against open AP (Rebound #1)
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	2,425.00	Paid	Paid against open AP (Rebound #3)
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	2,610.00	Paid	Paid against open AP (Rebound #2)
1010 Checking #6063	02/01/2020	Bill Payment		No Description provided - yprnt through Accounts Payable #2001	2,935.00	Paid	Paid against open AP (Brid Flight 3-3)
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	4,664.07	Paid	Paid against open AP (17679 part)
1010 Checking #6063	02/01/2020	Bill Payment		No Description provided - yprnt through Accounts Payable #2001	5,000.00	Paid	Paid against open AP (Rebound #4-23)
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	7,377.42	Paid	Paid against open AP (Rebound #4-13)
1010 Checking #6063	02/01/2020	Bill Payment		No Description provided - yprnt through Accounts Payable #2001	780.00	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	1,039.96	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Bill Payment		No Description provided - yprnt through Accounts Payable #2001	1,060.27	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	1,448.54	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Bill Payment		No Description provided - yprnt through Accounts Payable #2001	5,839.37	Paid	Paid against open AP (Payment settlement of Measure #2 on 4/2, 1/2)
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	8,068.93	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	10,999.83	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Bill Payment		No Description provided - yprnt through Accounts Payable #2001	11,500.00	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	12,994.93	Paid	Paid against open AP (17679 part Libbey)
1010 Checking #6063	02/01/2020	Bill Payment		No Description provided - yprnt through Accounts Payable #2001	30,353.96	Paid	Paid against open AP (Genevieve 1.65)
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	50.00	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Bill Payment		No Description provided - yprnt through Accounts Payable #2001	950.00	Paid	Paid against open AP (Genevieve 2.05)
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	47.96	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Bill Payment		No Description provided - yprnt through Accounts Payable #2001	200.00	Paid	Paid against open AP (Ryan Mann Labco)
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	222.85	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	363.33	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Bill Payment		No Description provided - yprnt through Accounts Payable #2001	780.00	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	2,465.84	Paid	Paid against open AP (Genevieve 3.65)
1010 Checking #6063	02/01/2020	Bill Payment		No Description provided - yprnt through Accounts Payable #2001	3,343.90	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	4,965.25	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	6,175.00	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	7,141.89	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Bill Payment		No Description provided - yprnt through Accounts Payable #2001	8,050.49	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	8,520.00	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Bill Payment		No Description provided - yprnt through Accounts Payable #2001	10,018.49	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	17,679.00	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	600.00	Paid	Paid against open AP (Genevieve 4.05)
1010 Checking #6063	02/01/2020	Bill Payment		No Description provided - yprnt through Accounts Payable #2001	4,030.00	Paid	Paid against open AP (Construction Crew 3-13)
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	4,100.00	Paid	Not listed in report provided by D Stenell
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	154.87	Paid	Paid against open AP (NAMI E Luvini)
1010 Checking #6063	02/01/2020	Bill Payment		No Description provided - yprnt through Accounts Payable #2001	3,704.93	Paid	Paid against open AP (Golds Water Pump 1-3)
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	8,100.20	Paid	Paid against open AP (Genevieve 5.05)
1010 Checking #6063	02/01/2020	Bill Payment		No Description provided - yprnt through Accounts Payable #2001	10,500.00	Paid	Paid against open AP (Golds Water Pump 2-3)
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	164.29	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Bill Payment		No Description provided - yprnt through Accounts Payable #2001	281.85	Paid	Paid against open AP (Briquet 12K, 12J)
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	483.35	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Bill Payment		No Description provided - yprnt through Accounts Payable #2001	605.00	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	1,063.38	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Bill Payment		No Description provided - yprnt through Accounts Payable #2001	2,278.73	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	5,000.00	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	5,253.42	Paid	Paid against open AP (Golds Water Pump 3-3)
1010 Checking #6063	02/01/2020	Bill Payment		No Description provided - yprnt through Accounts Payable #2001	9,870.10	Paid	Paid against open AP
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	31,000.00	Paid	HAS (Briquet 12K, 2J \$10,015.54, \$6045.35, \$2550.33, \$44.00 4/1, \$345.00 Measure 4/2, \$400.42, \$401.70-8, \$803.24 4/1, 4/13 \$1000, 4/18 \$5000, 4/18 \$4175, 4/18 \$547.35, 4/18 \$164.24, 4/17 \$1000, 4/20 \$800, 4/23 \$415.19)
1010 Checking #6063	02/01/2020	Bill Payment		No Description provided - yprnt through Accounts Payable #2001	1,031.73	Paid	Paid against open AP (Genevieve Thistle Sheds)
1010 Checking #6063	02/01/2020	Check		No Description provided - yprnt through Accounts Payable #2001	1,151.50	Paid	Paid against open AP

1010 Checking #1063	07/24/2020	Bill Payment		No Description provided - print through Accounts Payable #2001	2,818.77	Paid	Paid against open AP (Quantum Shelling 13)
1010 Checking #1063	08/13/2020	Check		No Description provided - print through Accounts Payable #2001	5,000.00	Paid	Paid against open AP (Quantum Shelling 20)
1010 Checking #1063	08/05/2020	Bill Payment		No Description provided - print through Accounts Payable #2001	21.75	Paid	Paid against open AP
1010 Checking #1063	08/05/2020	Check		No Description provided - print through Accounts Payable #2001	309.00	Paid	x
1010 Checking #1063	08/05/2020	Bill Payment		No Description provided - print through Accounts Payable #2001	1,557.83	Paid	Paid against open AP
1010 Checking #1063	08/05/2020	Check		No Description provided - print through Accounts Payable #2001	1,941.55	Paid	Paid against open AP
1010 Checking #1063	08/05/2020	Bill Payment		No Description provided - print through Accounts Payable #2001	2,807.48	Paid	Paid against open AP
1010 Checking #1063	08/05/2020	Check		No Description provided - print through Accounts Payable #2001	3,951.83	Paid	Paid against open AP
1010 Checking #1063	08/05/2020	Bill Payment		No Description provided - print through Accounts Payable #2001	4,472.28	Paid	Paid against open AP
1010 Checking #1063	08/05/2020	Check		No Description provided - print through Accounts Payable #2001	5,079.70	Paid	Paid against open AP
1010 Checking #1063	08/05/2020	Bill Payment		No Description provided - print through Accounts Payable #2001	6,385.45	Paid	Paid against open AP (Quantum Shelling 30)
1010 Checking #1063	08/05/2020	Check		No Description provided - print through Accounts Payable #2001	11,191.60	Paid	Paid against open AP
1010 Checking #1063	10/15/2020	Bill Payment		No Description provided - print through Accounts Payable #2001	960.00	Paid	Paid against open AP
1010 Checking #1063	04/05/2021	Check		No Description provided - print through Accounts Payable #2001	3,517.66	Paid	Not listed in report provided by D. Sharfili
1010 Checking #1063	04/05/2021	Expense		No Description provided - print to Long Term Loan D. Sharfili	25,000.00	Paid	Not listed in report provided by D. Sharfili
1010 Checking #1063	04/05/2021	Expense		No Description provided - print to Long Term Loan D. Sharfili	50,000.00	Paid	Not listed in report provided by D. Sharfili
1010 Checking #1063	05/05/2021	Transfer		No Description provided - print to acct #1022 Dove CC-5173	20,681.47	Paid	Not listed in report provided by D. Sharfili
1022 Dove CC #173	06/05/2021	Expense		Dove Car that we canceled	519.28	Paid	Not listed in report provided by D. Sharfili
1010 Checking #1063	06/05/2021	Expense		No Description provided - print to acct #1022 Dove CC-5173	15,000.00	Paid	Not listed in report provided by D. Sharfili
1022 Dove CC #173	06/11/2021	Expense		Dove business trip	37.66	Paid	Not listed in report provided by D. Sharfili
1022 Dove CC #173	06/11/2021	Expense			30.49	Paid	Not listed in report provided by D. Sharfili

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